

Rebecca Rojas, Esq., *Pro Hac Vice*
HKM Employment Attorneys LLP
3600 Lime Street, Bldg. 2, Ste. 114
Riverside, CA 92501
Tel/Fax: (951) 269-4229
Email: rrojas@hkm.com

Dana Sniegocki, Esq.
Nevada Bar No. 11715
HKM EMPLOYMENT ATTORNEYS LLP
101 Convention Center Dr., Suite 600
Las Vegas, NV 89109
dsniegocki@hkm.com
Phone: (702) 623-7279

Attorneys for ANNA “TASHA” MCKENZIE

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ANNA “TASHA” MCKENZIE,
an Individual,

Plaintiff,

v.

AMAZON.COM SERVICES LLC,
a foreign limited liability company,

Defendant.

Case No. 2:24-cv-00262-APG-NJK

**STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFF’S
RESPONSE TO DEFENDANT’S
PARTIAL MOTION TO DISMISS
PLAINTIFF’S FIRST AMENDED
COMPLAINT**

(FIRST REQUEST)

Pursuant to LR IA 6-1, LR IA 6-2 and LR 7-1, Plaintiff Anna “Tasha” McKenzie (“Plaintiff”) and Defendant Amazon.com Services LLC, (“Defendant”) (collectively “the Parties”), by and through their respective counsel of record, hereby request and stipulate to extend the time for Plaintiff to respond to Defendant’s Partial Motion to Dismiss Plaintiff’s First Amended Complaint (“Motion”) (ECF No. 27), which was filed on April

12, 2024. Plaintiff's Opposition to Defendant's Partial Motion to Dismiss would be due on April 26, 2024. The Parties stipulate to an extension of time allowing Plaintiff to file an opposition by **May 21, 2024**. This is the first request for an extension of time to file an opposition to Defendant's Partial Motion to Dismiss Plaintiff's First Amended Complaint.

The extension is requested for the sake of conserving private and judicial resources, as there is a pending settlement demand being considered by Defendant Amazon. The deadline to accept this settlement demand is May 3, 2024. In the meantime, in order to facilitate settlement, the Parties have granted mutual extensions for pending discovery and also agreed to stipulate to an extension of time for Plaintiff to file an Opposition to Defendant's Partial Motion to Dismiss.

This request for extension is made in good faith and is intended to conserve both private and judicial resources and because it will facilitate potential settlement. Without an extension, the current settlement will be threatened.

DATED: April 18, 2024

HKM EMPLOYMENT ATTORNEYS LLP

By: /s/ Rebecca Rojas

Rebecca Rojas, Esq., *Pro Hac Vice*
3600 Lime Street, Bldg. 2, Ste. 114
Riverside, CA 92501
Tel/Fax: (951) 269-4229
Email: rrojas@hkm.com

Dana Sniegocki, Esq.
101 Convention Center Dr., Suite 600
Las Vegas, NV 89109
dsniegocki@hkm.com
Phone: (702) 623-7279

Attorneys for Plaintiff Anna "Tasha"
McKenzie

1
2 DATED: April 18, 2024

LITTLER MENDELSON, P.C.

3
4 By: /s/Wendy Krincek

5 WENDY M. KRINCEK, ESQ.

6 EMIL S. KIM, ESQ.

3960 Howard Hughes Parkway, Suite 300

7 Las Vegas, Nevada 89169.5937

8 Telephone: 702.862.8800

9 Fax No.: 702.862.8811

wkrincek@littler.com

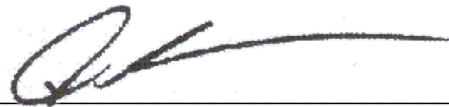
ekim@littler.com

10
11 Attorneys for Defendant

12 AMAZON.COM SERVICES LLC

13
14
15 **ORDER**

16 IT IS SO ORDERED.

17
18 

19 UNITED STATES DISTRICT JUDGE

20
21 DATED: April 23, 2024